CYCLE II EXTERNAL
ENVIRONMENTAL COMPLIANCE ASSESSMENT
PRELIMINARY FINDINGS REPORT

COLEBROOK RIVER LAKE
RIVERTON, CONNECTICUT

U.S. Army Corps of Engineers
New England Division
424 Trapelo Road
Waltham, Massachusetts
02254-9149

December 1996

For Inter Corps Distribution Only

EXECUTIVE SUMMARY

An environmental compliance assessment of Colebrook River Lake was conducted by a team of New England Division (NED) environmental professionals on 24 April 1996. This was a Cycle II External Assessment. The Cycle I External Assessment was conducted from 1-5 June 1992.

The assessment was conducted as part of the U.S. Army Corps of Engineers Environmental Review Guide for Operations (ERGO) program. The ERGO program, developed by the U.S. Army establishes the use of environmental compliance assessments to ensure compliance with all applicable Federal, State, local, Department of Defense (DoD), and U.S. Army environmental laws and regulations.

An overall ERGO compliance assessment considers 13 major environmental compliance categories. For each category, Federal, State and local laws, DoD and U.S. Army Corps of Engineers regulations, and good management practices are reviewed.

Overall the project was well maintained. The summary of deficiencies at Colebrook River Lake is as follows:

Significant Deficiencies - 0
Problems that pose a direct and immediate threat to human health, safety, the environment, or the facility's mission, and require immediate attention.

Major Deficiencies - 1
Problems that require action, but not necessarily immediate action, and pose a threat to human health, safety or the environment.

Minor Deficiencies - 11
Deficiencies that are usually administrative in nature. These problems require monitoring or planning for future mitigation.

Management Practices - 3
Items noted are not specifically covered by a specific regulatory requirement; however, they still require management attention.

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THE ERGO PROGRAM

The U.S. Army Corps of Engineers initiated the Environmental Review Guide for Operations (ERGO) program as a comprehensive self-evaluation and program management system for achieving, maintaining, and monitoring compliance with environmental laws and regulations at Corps of Engineers projects and facilities. Objectives of the ERGO program are to:

1) Enhance Corps of Engineers environmental compliance at Federal, State and local levels.

2) Improve Corps of Engineers environmental management.

3) Build supporting financial programs and budgets.

4) Assure supervisors that their environmental programs are being implemented effectively in accordance with Corps of Engineers goals and objectives.

Periodic environmental compliance assessments have been deemed necessary. These evaluations are designed to assess environmental compliance and provide necessary feedback to supervisors for organizing, directing, and controlling environmental compliance and protection activities.

New England Division's (NED's) ERGO program became operational in 1991. Because it is responsible for the majority of USACE facilities, Operations Directorate is tasked with the development and implementation of the ERGO program. Every five years, each NED project undergoes an external environmental compliance assessment. This assessment is conducted by a team of environmental professionals. Every NED project has already had one external environmental compliance assessment. The assessment described in this report is the second external assessment for this project, and is therefore known as a Cycle II External Environmental Compliance Assessment. The project itself is responsible for performing an internal self assessment annually, with the exception of those years when an external assessment is being done.

ASSESSMENT PROCEDURES

The ERGO assessment of Colebrook River Lake was conducted by a 7 person team comprised of NED personnel, and took place on 24 April 1996. The team followed a three phase approach. The first phase was to obtain pre-assessment information concerning its on-site activities (see Appendix A - Previsit Questionnaires) and research applicable Federal, State and local environmental regulations. This culminated in the development of site/facility-specific categories.

The second phase involved the on-site portion of the assessment. This involved an interview of project staff, followed by a facility tour, including major outgrants, to obtain a general overview of the facility operations. Typically, the team member would interview project staff responsible for a particular functional area, visually inspect the operations, and verify that required written documentation was in place. When possible, all deficiencies were reported to facility personnel. The team concluded the on-site portion of the assessment by briefing the project staff to apprise them of the review team's preliminary findings.

The third phase involves developing the draft report and developing an action plan for addressing outstanding deficiencies. The evaluation of Colebrook River Lake followed the above procedures and covered the elements set forth in the 13 ERGO compliance categories.

The assessment was conducted in accordance with the best professional judgement of the ERGO team members. It should be understood that the assessment is based on observations taken over a short span of time relative to the period under review. Efforts were directed toward reviewing major facets of environmental performance in the period covered and, therefore, it is important to recognize that this assessment may not necessarily identify all potential problems.

Successful completion of the site-specific environmental evaluation of Colebrook River Lake was dependent on complete disclosure by Project staff and outgrantees of all information regarding the operation and maintenance activities at the project.

It should be noted that failure of a manager to provide complete or adequate information to the review team does not relieve the manager of the responsibility for compliance with environmental regulations.

ERGO PROGRAM OBJECTIVES

The Environmental Review Guide for Operations (ERGO) program guidance is embodied primarily in two publications: The Environmental Assessment and Management (TEAM) Guide, applicable to participating DoD components, including the U.S. Army Corps of Engineers (USACE), and the Supplement to The Environmental Assessment and Management (TEAM) Guide, applicable to Corps of Engineers Civil Works activities, operating projects and floating plant, including outgranted lands and concessions. In addition, state-specific supplements have been prepared for some states.

Objectives of the TEAM Guide are as follows:

1. Compile applicable Federal regulations with DoD component operations and activities.

2. Synthesize environmental regulations, management practices, and risk management issues into consistent and easy to use checklists.

3. Serve as an aid in the assessment process and management action development phases of DoD component environmental assessment programs.

Objectives of the Supplement to the TEAM Guide are as follows:

1. Compile applicable Department of Defense (DoD) regulations, and Engineer Regulations (ERs) associated with USACE operations and activities.

2. Synthesize regulations, management practices, and risk management issues into consistent and easy-to-use checklists.

3. Serve as a reference document and educational tool for daily operations.

4. Serve as a guide for implementing the U.S. Army Environmental Strategy Into the 21st Century, which emphasizes environmental stewardship as an integral part of everything the USACE does.

DESCRIPTION OF REGULATORY COMPLIANCE

This section of the report presents a summary of findings in those categories that are governed by engineering regulations, engineering manuals, Federal regulations, State regulations and local regulations. Non-regulatory items, which are referred to in this report as management practices, are of a lower priority but require attention to correct.

Deficiencies noted in this evaluation will be categorized as follows:

SIGNIFICANT DEFICIENCY:

A problem categorized as significant requires immediate attention. It poses, or has a high likelihood to pose, a direct and immediate threat to human health, safety, the environment, or the facility's mission.

MAJOR DEFICIENCY:

A major deficiency requires action, but not necessarily immediate action. Major deficiencies may pose a threat to human health, safety or the environment. Any immediate threat, however, must be categorized as significant.

MINOR DEFICIENCY:

Minor deficiencies are usually administrative in nature, even though those findings might possibly result in a notice of violation. This category may also include temporary or occasional instances of noncompliance.

MANAGEMENT PRACTICE:

Management practice items are those for which there is no specific regulatory requirement; however they still require management attention.

Summary of Deficiencies for Colebrook River Lake

ERGO Compliance Categories	Sign. Findings	Major Findings	Minor Findings	MP Findings
Air Emissions Management	0	0	0	0
Cultural Resources Management	0	0	2	0
Hazardous Materials Management	0	0	0	0
Hazardous Waste Management	0	0	0	0
Natural Resources Management	0	0	4	0
Other Environmental Issues	0	0	1	0
Pesticide Management	0	0	0	0
POL Management	0	0	1	0
Solid Waste Management	0	0	0	0
Storage Tank Management	0	0	2	2
Toxic Substances Management	0	1	0	1
Wastewater Management	0	0	1	0
Water Quality Management	0	0	0	0
Totals	0	1	11	3

AIR EMISSIONS MANAGEMENT

No Findings

CULTURAL RESOURCES MANAGEMENT

FY96 ERGO Cycle II External Assessment Report Inputs

Colebrook River Lake

Historic and Archaeological Resources

Narrative

As a result of the assessment and site visit, it appears that the main area of concern is the confirmation of archaeological sites located during the reconnaissance survey which may or may not be within the Colebrook Lake project area. Apparently, the recon survey was completed prior to proper institution of boundary markers delineating Corps property versus Hartford MDC property. This archaeological recon survey should be reevaluated together with Colebrook River staff in order to ascertain correct boundary locations and whether identified sites are within our jurisdiction.

ERGO Compliance Action Plan II items a-e were compiled by project staff. They include the following: Site visit with staff archaeologist in order to address issues taken from the compliance action dated 3 April 1996 should be scheduled as soon as possible. Archaeological sites which may have been impacted by dirt bike trails should be identified. These sites may not be on Corps property. Four historic sites were noted as possible safety hazards due to open wells and septic tank pits. These areas should be identified and mitigated for (by filling or capping) as appropriate for public safety. Apparently, temporary cover was placed over a well on July 1992. It is not known if this is the only area of concern. Site visit in conjunction with above paragraph should be scheduled as soon as possible.

Intensive archaeological surveys and further evaluation of identified archaeological resources should be conducted in the near future as mandated by law (National Historic Preservation Act). This should proceed after the reconnaissance survey report is revised according to boundary marker delineation as stated above.

Some items of note: Project Manager indicated that no bike trails are located on property. Perhaps sites affected by trails are on MDC property. One 10 foot well has been covered and filled-where? Check on condition of existing historic sites during site visit. Any future construction or development related activities including trail or road rehab, timber sales, gravel operations, dredging, clearing, maintenance of archaeological remains etc. should be coordinated with Planning Directorate, Evaluation Division.

FINDING SUMMARY

INDIVIDUAL FINDING SHEET

03650 CT COLEBROOK RIVER LAKE

Type of Finding: NEGATIVE Finding Category: MINOR

Condition (What did you find?)

The project has had a recon level archaeological survey done. However, this survey needs to be re-evaluated as boundary surveys were completed after the survey was done. Many of the identified sites may be outside of the project area. Previous findings from Colebrook Lake ERGO Compliance Action Plan, April 1996, concerning erosion impacts to sites at bike trails and the filling or capping of four historic sites need to be verified as to whether within the project boundary by a site visit.

Criteria (What is the actual requirement?)
C.5.1. All Federal agencies are required to establish a program to locate, inventory, and nominate to the SOI all properties under the agency's ownership or control that appear to qualify for inclusion on the National Register of Historic Places (36 CFR 60.9).

Suggested Solutions:
A site visit should be conducted as soon as possible in order to confirm the correct boundaries of the project areas and archaeological sites identified as a result of the reconnaissance survey.

Comments:
Project is not in full compliance with Section 110 of the National Historic Preservation Act of 1966, as amended. Once the original recon archaeological survey is revised according to the correct boundaries, then further intensive level archaeological evaluation studies may proceed.

Assessor: Marcos A. Paiva

FINDING SUMMARY

INDIVIDUAL FINDING SHEET

03650 CT COLEBROOK RIVER LAKE

Type of Finding: NEGATIVE Finding Category: MINOR

Condition (What did you find?)

The project has only completed a reconnaissance level archaeological survey and inventory. Several prehistoric and historic sites were identified that required further evaluation in order to determine their eligibility to the National Register of Historic Places.

Criteria (What is the actual requirement?)
C.5.1. All Federal agencies are required to establish a program to locate, inventory, and nominate to the SOI all properties under the agency's ownership or control that appear to qualify for inclusion on the National Register of Historic Places (36 CFR 60.9).

Suggested Solutions:
Completion of further evaluation of potentially significant cultural resources. However, please note previous finding concerning boundary delineations. That work would need to be accomplished first.

Comments:
It should be noted that further evaluation of identified sites can only be accomplished after the confirmation of the reconnaissance archaeological survey according to boundaries. Many sites may be outside of the Corps project area.

Assessor: Marcos A. Paiva

HAZARDOUS MATERIALS MANAGEMENT

No Findings

HAZARDOUS WASTE MANAGEMENT

No Findings

NATURAL RESOURCES MANAGEMENT

Natural Resources and Other Environmental Issues Narrative for
Colebrook River Lake ERGO Review

The ERGO Team Review and facility tour conducted on April 24, 1996 was very informative. The majority of natural resource compliance issues involve the preparation of documents (EA and Master Plan). This project has an approved OMP dated 28 July 1993 which contains a Forest and Fish and Wildlife Management Plan. One omission to the Fish and Wildlife Management Plan is a formal survey of threatened/endangered species for the project area. This information is necessary to complete a plan for maintenance, restoration or protection of habitat favorable to threatened/endangered species. A threatened/endangered species inventory is scheduled to be conducted in FY2000 and should be included in the OMP update (OMPs should be revised every 5 years). In addition, a wetland survey is scheduled during FY2000 and will be included in the EA.

The previous ERGO review cited the Project for filling wetlands during construction of an access road and dike associated with the "Beaver Pond" sub impoundment. According to information provided by the Colebrook Lake Project Manager, the access road and dike already existed but had been recently top dressed to repair some erosion just prior to the 1993 ERGO inspection. After the road was repaired, a beaver built a dam downstream which caused a backwater effect in the area and enhanced wetland development adjacent to the road. In addition, the oversized culvert observed at the site was placed to deter beaver dams which could cause water to impound and overtop the dike. The Colebrook Lake Wildlife Refuge Area Management Plan (1993) shows an area of fill along the northern portion of emergency access road "H" to be planted as a wildlife food plot. However, these plans have since been altered (the wildlife food plot was established in a different area) and there are no future plans to increase the width of the access road. Therefore, this minor deficiency has been removed.

Two findings were eliminated under the Special Pollutants Management, Noise section. The Project now maintains a noise complaint log. There have been no problems related to the issue of noise. In addition, a noise survey was conducted at the Project. The Colebrook River Lake Project has implemented noise control measures appropriate to the concernable noise generating equipment.

FINDING SUMMARY

INDIVIDUAL FINDING SHEET

03650 CT COLEBROOK RIVER LAKE
The Project

Type of Finding: NEGATIVE Finding Category: MINOR

Condition (What did you find?)

The Master Plan for Colebrook River Lake was prepared in 1977. The Plan is outdated and does not reflect current conditions.

Criteria (What is the actual requirement?)
NR.2. Master plans are required to be developed and kept current for all Civil Works projects and other fee owned lands for which the Corps has administrative responsibility for management (ER 1130-2-435, para 5, para 8, and para 9).

Suggested Solutions:
Preparation of a Master Plan for the Colebrook River Lake project is scheduled for FY2002.

Comments:

Assessor: Judith Johnson

FINDING SUMMARY

INDIVIDUAL FINDING SHEET

03650 CT COLEBROOK RIVER LAKE
The Project

Type of Finding: NEGATIVE Finding Category: MINOR

Condition (What did you find?)

Wetlands at the project have not been identified and protected.

Criteria (What is the actual requirement?)
NR.7. Floodplains and wetlands should be identified and protected.

Suggested Solutions:
A wetland survey is scheduled for FY2000 to identify and delineate wetlands at the Colebrook River Lake project.

Comments:

Assessor: Judith Johnson

FINDING SUMMARY

INDIVIDUAL FINDING SHEET

03650 CT COLEBROOK RIVER LAKE
The Project

Type of Finding: NEGATIVE Finding Category: MINOR

Condition (What did you find?)

Project lacks threatened/endangered species survey.

Criteria (What is the actual requirement?)
NR.9. Emphasis should be placed on the maintenance and restoration of habitat favorable to the production of indigenous fish and wildlife.

Suggested Solutions:
A threatened/endangered species survey is scheduled to be conducted at the Colebrook River Lake project in FY2000.

Comments:

Assessor: Judith Johnson

FINDING SUMMARY

INDIVIDUAL FINDING SHEET

03650 CT COLEBROOK RIVER LAKE
The Project

Type of Finding: NEGATIVE Finding Category: MINOR

Condition (What did you find?)

The Environmental Assessment for the Operation and Maintenance of the Colebrook River Lake project was prepared in 1977. This document needs to be updated to address existing conditions at the project.

Criteria (What is the actual requirement?)
NR.

An updated EA/FONSI assessing impacts of current Operation and Maintenance of the Colebrook River Lake project on existing conditions is necessary to comply with the National Environmental Policy Act (NEPA) of 1969.

Suggested Solutions:
An Environmental Assessment update is currently scheduled to be prepared for the Colebrook River Lake project in FY2000.

Comments:

Assessor: Judith Johnson

OTHER ENVIRONMENTAL ISSUES

Natural Resources and Other Environmental Issues Narrative for
Colebrook River Lake ERGO Review

The ERGO Team Review and facility tour conducted on April 24, 1996 was very informative. The majority of natural resource compliance issues involve the preparation of documents (EA and Master Plan). This project has an approved OMP dated 28 July 1993 which contains a Forest and Fish and Wildlife Management Plan. One omission to the Fish and Wildlife Management Plan is a formal survey of threatened/endangered species for the project area. This information is necessary to complete a plan for maintenance, restoration or protection of habitat favorable to threatened/endangered species. A threatened/endangered species inventory is scheduled to be conducted in FY2000 and should be included in the OMP update (OMPs should be revised every 5 years). In addition, a wetland survey is scheduled during FY2000 and will be included in the EA.

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Two findings were eliminated under the Special Pollutants Management, Noise section. The Project now maintains a noise complaint log. There have been no problems related to the issue of noise. In addition, a noise survey was conducted at the Project. The Colebrook River Lake Project has implemented noise control measures appropriate to the concernable noise generating equipment.

FINDING SUMMARY

INDIVIDUAL FINDING SHEET

03650 CT COLEBROOK RIVER LAKE
Project-wide

Type of Finding: NEGATIVE Finding Category: MINOR

Condition (What did you find?)

Facility does not have a Pollution Prevention Plan.

Criteria (What is the actual requirement?)
O4.5.1. Installations/ CW facilities are required to prepare pollu- tion prevention plans by 31 December 1995 (EO 12856, Section 3-302(d)).

Suggested Solutions:
Develop and finalize a written Pollution Prevention Plan for the facility.

Comments:
Since Colebrook River Lake is not a "CW" (covered) facility pursuant to the above criteria, the Pollution Prevention Plan was not due until 30 September 1996. It was completed and approved in June of 1996.

Assessor: Robert W. Davis

PESTICIDE MANAGEMENT

No Findings

PETROLEUM, OIL AND LUBRICANT (POL) MANAGEMENT

FINDING SUMMARY

INDIVIDUAL FINDING SHEET

03650 CT COLEBROOK RIVER LAKE
Project-wide

Type of Finding: NEGATIVE Finding Category: MINOR

Condition (What did you find?)

Colebrook River Lake does not perform mock spill or training events for potential petroleum and hazardous substance discharges (spills) in accordance with approved Spill Prevention, Control, and Countermeasures Plan and Spill Contingency Plan (SPCCP/SCP).

Criteria (What is the actual requirement?)
PO.10.3. Facilities that are required to have a response plan are also required to develop and implement a facility response training program and a drill/exercise program that meet specific parameters (40 CFR 112.21).

Suggested Solutions:
Perform mock spill event and training exercises.

Comments:
Continue facility response training program and implement a drill/exercise program.

Assessor: Robert W. Davis

SOLID WASTE MANAGEMENT

No Findings

STORAGE TANKS MANAGEMENT

FINDING SUMMARY

INDIVIDUAL FINDING SHEET

03650 CT COLEBROOK RIVER LAKE
Control Tower

Type of Finding: NEGATIVE Finding Category: MINOR

Condition (What did you find?)

The 590 gallon aboveground storage tank (AST) containing fuel oil in the Control Tower lacks secondary containment.

Criteria (What is the actual requirement?)
ST.5.1. All bulk storage tanks (over 660 gal [2498 L]) are required to be provided with a secondary means of containment for the entire contents of the largest single tank plus sufficient freeboard to allow for precipitation (40 CFR 112.1(d), 112.7(d), and 112.7(e)(2)(ii)).

Fuel storage tanks shall be diked or curbed to contain the tank contents in the event of leakage (EM 385-1-1 Para. 19.A.06(g), 1 October 1992).

Suggested Solutions:
Design and construct secondary containment for this AST sufficiently large to contain the capacity of this tank in the event of a leak. The secondary containment structure should also have a drainage valve.

Comments:
The Control Tower basement is not sealed, therefore no secondary containment exists for the 590 gallon AST. The basement is equipped with a sump pump that discharges to the Lake. However, a leak detection warning system for any oil (including hydraulic fluid) has been installed that shuts down the basement sump pump, thereby reducing the potential for a contaminant release to the Lake.

Assessor: Robert W. Davis

FINDING SUMMARY

INDIVIDUAL FINDING SHEET

03650 CT COLEBROOK RIVER LAKE
Control Tower

GOOD

Finding Category: MANAGEMENT PRACTICE

Condition (What did you find?)

Secondary containment of piping to and from the fuel oil and hydraulic oil storage tanks at the project should be addressed.

Criteria (What is the actual requirement?) None

ST.5.1. All bulk storage tanks (over 660 gal [2498 L]) are required to be provided with a secondary means of containment for the entire contents of the largest single tank plus sufficient freeboard to allow for precipitation (40 CFR 112.1(d), 112.7(d), and 112.7(e)(2)(ii)).

Albeit Paragraph 19.A.06(g) of EM 385-1-1 (1 October 1992) requires secondary containment for fuel storage tanks, no regulatory requirement exists for secondary containment of the piping except in the case of systems transporting hazardous wastes.

Suggested Solutions:
Installation and use of antisiphon devices (e.g. automatic cutoff valve) for fuel oil and hydraulic fluid in the gate house would greatly reduce the potential for a contaminant release from a piping leak to Colebrook River Lake, a secondary public drinking water supply.

Comments:
The recent upgrade and/or replacement of project underground and aboveground fuel storage tanks including leak protection systems, and secondary containment of the tanks and new piping have resulted in significant pollution prevention improvements. However, concerns presently exist for older piping lacking secondary containment in sensitive environmental areas.

Assessor: Robert W. Davis

FINDING SUMMARY

INDIVIDUAL FINDING SHEET

03650 CT COLEBROOK RIVER LAKE
Hartford MDC Hydro

Type of Finding: NEGATIVE Finding Category: MINOR

Condition (What did you find?)

The 1300 gallon aboveground storage tank (AST) containing hydraulic fluid in the Control Tower lacks secondary containment.

Criteria (What is the actual requirement?)
ST.5.1. All bulk storage tanks (over 660 gal [2498 L]) are required to be provided with a secondary means of containment for the entire contents of the largest single tank plus sufficient freeboard to allow for precipitation (40 CFR 112.1(d), 112.7(d), and 112.7(e)(2)(ii)).

Fuel storage tanks shall be diked or curbed to contain the tank contents in the event of leakage (EM 385-1-1 Para. 19.A.06(g), 1 October 1992).

Suggested Solutions:
Design and construct secondary containment for this AST sufficiently large to contain the capacity of this tank in the event of a leak. The secondary containment structure should also have a drainage valve.

Comments:
The Control Tower basement is not sealed, therefore no secondary containment exists for the 1300 gallon AST. The basement is equipped with a sump pump that discharges to the Lake. However, a leak detection warning system has been installed that shuts down the sump pump, thereby reducing the potential for a contaminant release to the Lake.

Assessor: Robert W. Davis

FINDING SUMMARY

INDIVIDUAL FINDING SHEET

03650 CT COLEBROOK RIVER LAKE
Hartford MDC Hydro

GOOD

Finding Category: MANAGEMENT PRACTICE

Condition (What did you find?)

Outside emergency generator with built-in 85 gallon aboveground diesel fuel tank (AST) lacks secondary containment (see Photos #1 and 2). The rectangular fuel tank is located immediately above and parallel to the concrete pad.

Criteria (What is the actual requirement?)
ST.5.1. All bulk storage tanks (over 660 gal [2498 L]) are required to be provided with a secondary means of containment for the entire contents of the largest single tank plus sufficient freeboard to allow for precipitation (40 CFR 112.1(d), 112.7(d), and 112.7(e)(2)(ii)).

Fuel storage tanks shall be diked or curbed to contain the tank contents in the event of leakage (EM 385-1-1 Para. 19.A.06(g), 1 October 1992).

Suggested Solutions:
Design and construct secondary containment for this AST sufficiently large to contain the capacity of this tank in the event of a leak. The secondary containment structure should also have a drainage valve.

Comments:
The AST, albeit self-contained within the emergency generator, is located adjacent to Colebrook River Lake, a secondary public drinking water supply.

Assessor: Robert W. Davis

TOXIC SUBSTANCES MANAGEMENT

FINDING SUMMARY

INDIVIDUAL FINDING SHEET

03650 CT COLEBROOK RIVER LAKE
The Project

GOOD

Finding Category: MANAGEMENT PRACTICE

Condition (What did you find?)

A PCB survey is on file. No PCBs on site. Need to make certain that MDC areas at the Project are and will continue to be PCB-free.

Criteria (What is the actual requirement?)
T1.10.2. Storage Rooms and certain equipment that contains PCBs must be marked with an ML marking (40 CFR 761.40 and 761.45) [January 1995].

Suggested Solutions:
Coordinate with the MDC to get in writing that they do not have PCBs on site nor are they bringing PCBs on site.

Comments:

Assessor: James Peck

FINDING SUMMARY

INDIVIDUAL FINDING SHEET

03650 CT COLEBROOK RIVER LAKE
Office and Old Construction Building

Type of Finding: NEGATIVE Finding Category: MAJOR

Condition (What did you find?)

Questionable floor tile in the buildings has not been tested for asbestos and was not noted in the last asbestos survey.

Criteria (What is the actual requirement?)
T2.2. Facility buildings with the potential to be contaminated with asbestos should be tested and surveyed for asbestos and friable material.

Suggested Solutions:
The floor tile should be sampled to see whether ACM is present. If so, plans and documents should reflect this fact and any cracked and friable pieces should be abated from the area.

Comments:
Samples obtained by the Safety Office were analyzed by the NED Environmental Laboratory. Results indicate that ACM is present.

Assessor: James Peck

WASTEWATER MANAGEMENT

1996 COLEBROOK RIVER LAKE ERGO INSPECTION
WASTEWATER AND WATER QUALITY MANAGEMENT

1. General. Inspection of Colebrook River Lake was carried out on 24 April 1996. Project personnel appear to be taking environmental compliance seriously. No change was reported in water supply or wastewater disposal systems. Water is supplied from wells. Wastewater is disposed of through septic tanks and leaching fields.

2. Resolution of Past Findings - Wastewater Management.

Minor Deficiency. Floor drains in the vehicle maintenance garage are connected to a septic tank and leaching field. Removable plugs have been installed in these drains; however, the State of Connecticut does not allow removable plugs and requires permanent seals.

Criteria. Under Connecticut State Statute 22A-430-3, discharge of vehicle maintenance floor drainage to a septic system is not allowed due to possible groundwater contamination.

Recommendation. The Connecticut Bureau of Water Management recommends the following three methods of dealing with vehicle maintenance bay floor drains connected to septic systems: (a) connect the floor drain to an oil-water separator and then to a municipal sanitary sewer, (b) install a holding tank for floor drainage and set up a contract to have the waste periodically hauled away, or (c) seal the drains permanently. As no sanitary sewer line is available to the project, only the second two options are feasible. The last method is recommended by the State, since there is no liability or cost involved in paying a waste handler every time the wastewater is hauled away. Sealing the drains creates an additional burden on project personnel since they have to mop the floor after snow melts off vehicles. This mop water can be poured into a sink connected to a septic system without violating regulations.

3. Resolution of Past Findings - Water Quality Management.

Management Practice. Open abandoned well was a falling hazard. Abandoned wells have been filled in.

Management Practice. Sodium hypochlorite for water treatment was being stored although there was no longer an anticipated need for it. Material has been disposed of properly.

4. New Findings.

No new deficiencies were found relating to water quality or wastewater disposal in this external assessment.

FINDING SUMMARY

INDIVIDUAL FINDING SHEET

03650 CT COLEBROOK RIVER LAKE
Vehicle Maintenance Garage

Type of Finding: NEGATIVE Finding Category: MINOR

Condition (What did you find?)

Floor drains in the vehicle maintenance garage are connected to a septic tank and leaching field. Removable plugs have been installed in these drains; however, the State of Connecticut does not allow removable plugs and requires permanent seals.

Criteria (What is the actual requirement?)
WA.3.1. Installations/ CW facilities are required to comply with state and local wastewater regulations (EO 12088, Section 1-1).

Suggested Solutions:
Install a holding tank for floor drainage and set up a contract to have the waste periodically hauled away, or seal the drains permanently.

Comments:
Under the Connecticut State Statute 22A-430-3, discharge of vehicle maintenance floor drainage to a septic system is not allowed due to possible groundwater contamination.

Assessor: Townsend Barker

WATER QUALITY MANAGEMENT

No Findings

1996 COLEBROOK RIVER LAKE ERGO INSPECTION
WASTEWATER AND WATER QUALITY MANAGEMENT

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3. Resolution of Past Findings - Water Quality Management.

Management Practice. Open abandoned well was a falling hazard. Abandoned wells have been filled in.

Management Practice. Sodium hypochlorite for water treatment was being stored although there was no longer an anticipated need for it. Material has been disposed of properly.

4. New Findings.

No new deficiencies were found relating to water quality or wastewater disposal in this external assessment.

NEW ENGLAND DIVISION
ERGO TEAM

Bruce Williams - Program Manager
Operations Directorate - Operations Technical Support Division

Joseph Horowitz - ERGO Team Leader
Planning Directorate - Evaluation Division - Environmental Resources Branch

Judi Johnson
Planning Directorate - Evaluation Division - Environmental Resources Branch

Robert Davis
Planning Directorate - Evaluation Division - Environmental Resources Branch

Marc Paiva
Planning Directorate - Evaluation Division - Economic and Cultural Resources Branch

Townsend Barker
Engineering Directorate - Water Control Division
Chairman, NED's Water Quality Team

James Peck
NED's Safety Manager

Anne Laster
Real Estate Directorate - Conveyancing Division

The ERGO Team would like to thank the following individuals who participated in the pre-assessment evaluation, field inspection and/or in the research and evaluation of environmental compliance guidance:

Colebrook River Lake

Reese Morgan - Basin Manager
Robert Moretz - Project Manager
Jim Farrell - Park Ranger

APPENDICES

APPENDIX A: Previsit Questionnaires

COLEBROOK

Completed 02/26/96

Cycle II reassessment Schedule 4/24/96

Table 1

ERGO PREVISIT QUESTIONNAIRE (PVQ)

This questionnaire will provide background information necessary to plan and conduct an environmental compliance assessment. Additionally it provides insight for properly designing the composition of expertise on the assessment team.

Name of Facility: Colebrook River Lake
Environmental POC: Robert B Moretz
Telephone Number: 860-379-8234

	RESPONSE	REFERENCE IN TEAM
Section 1. Air Emissions Management		
1. Does the facility have any air permits to maintain with state regulatory authority (i.e. boilers, pathological incinerators, operating or construction permits, paint spray booths, POL tank vents, etc.)? Inclusively list the types and numbers of each:	NO	If YES, see checklist item A.1.3
Type of Permit / Quantity: _____ / _____ ; _____ / _____ ; _____ / _____		
2. Does the facility operate a fuel burner (central steam plant or hot water steam boiler)?	Yes	If YES, see checklist item A.10.1 through A.10.10
If YES, how large and what fuel is used? Size / Fuel: 114,000 BTUH / ~~#~~2 Fuel; _____ / _____; _____ / _____ Fuel oil/wood burning combo		
3. Does the facility operate an incinerator (i.e., for classified documents, solid waste, sewage sludge, etc.)? If YES, please list type and number.	NO	If YES, see checklist item A.25.1 through A.25.3 and A.41.1 through A.45.8
Type / Number: _____ / _____ ; _____ / _____ ; _____ / _____		
4. Does the facility operate fuel dispensing facilities?	Yes	If YES, see checklist item A.55.1 through A.55.6
How many? 1 - Pump on ~~#~~2 Fuel oil Conn vault @ utility building for filling project tractor		
5. Does the facility use any volatile organic compound (VOC) based solvent degreasers?	Yes	If YES, see checklist item A.1.3

	RESPONSE	REFERENCE IN TEAM
6. Does the facility operate maintenance shops?	NO	If YES, see checklist item A.1.3, A.85.1 through A.95.2

Type	Quantity
Wheeled	_____
Tracked	_____
Aircraft	_____

Please list any additionally shop activities that generate any form of air pollution (i.e., vehicle emissions systems, ventilation systems for various operations, etc.)

_____

_____

_____

7. Does the facility operate equipment or processes that could lead to fugitive emissions of vinyl chlorides or benzene?	NO	If YES, see checklist item A.65.1 through A.65.7
What types of equipment? _____		
8. Does the facility procure/use chlorofluorocarbons (CFC) or halon substances? Occassionally buy small cans of spray lubricants and Floressent paint.	Yes	If YES, see checklist item A.85.1 through A.85.4
9. Does the facility repair any units containing refrigerant?	NO	If YES, see checklist item A.90.1 through A.95.2
10. Does the facility recycle/reclaim CFCs or halon?	NO	If YES, see checklist item A.90.1 through A.95.2
11. Does the facility have any vapor emissions requirements for oil/water separators that have been imposed upon them.	NO	If YES, see checklist item A.1.3

	RESPONSE	REFERENCE IN TEAM
Section 2. Cultural Resources Management		
1. Does the facility have any cultural resources eligible for or that are currently listed in the National Register of Historic Places? See Reconnassance Study and FY 99 budget proposal for Survey.	No	If YES, see checklist item C.5.1 through C.5.3
2. Are their any cultural resources (archeological sites, buildings over 50 yr old) that have not been evaluated for the National Register?	No	If YES, see checklist item C.5.1 through C.5.3
3. Does the facility Master Plan contain a cultural resources overlay that is utilized for planning purposes? No current M.P. see budget schedule.	No	If YES, see checklist item C.5.1.1
4. Is there an on-staff Cultural Resources Coordinator?	No	See Supplement
5. If not, does a staff person have cultural resources as "other duties as assigned"?	No	See Supplement
6. Does the facility have any archeological artifacts in storage?		If YES, see checklist item C.20.1 through C.20.9
7. Does the facility have in storage, or know of, any locations of Native American burials, cemeteries, or human remains?	No	If YES, see checklist item C.15.1 through C.15.2
8. Are there any areas on the facility considered to have religious importance to any Native American Tribe?	No	If YES, see checklist item C.10.1

	RESPONSE	REFERENCE IN TEAM

Section 3. Hazardous Materials Management

1. **Has the facility conducted training for individuals working with hazardous materials?** Yes — If YES, see checklist item HM.10.1 through HM.10.2

   Hazard Communications - 4 hrs. (4/93)

2. **Does the facility have an Oil and Hazardous Substances Contingency Plan (OHSCP)?** Yes — If YES, see checklist item HM.1.3

   Completed in September 1995

3. **Does the facility store any extremely hazardous substances?** Yes — If YES, see checklist item HM.25.1

   Nitrogen in a tank in the gate chamber in the control Tower it belongs to HMDC under a licensed Hydro Facility.

4. **Does the facility store at one time 10,000 lb or more of any hazardous substances that requires a Material Safety Data Sheet (MSDS) (fuel is a hazardous substance which requires an MSDS)?** Yes — If YES, see checklist item HM.30.1 through HM.30.3

   (NOTE: Using water as a basis of measurement, 10,000 lb is approx. 1,250 gal.)

   Please list substances

   Hydraulic Fluid in gate operating systems
   HMDC's Hydro systems
   #2 Fuel Oil in Tanks at utility building & Control Tower

5. **Does the facility store any flammable/combustible liquids?** Yes — If YES, see checklist item HM.35.1 through HM.40.3

   ① #2 Fuel oil in oil tanks

   ② Gasoline For vehicles & gas powered equipment stored in Fire proof Cabinets in Fire proof room in U.B.

6. **Does the facility store any compressed gases?** Yes — If YES, see checklist item HM.45.1

   Not Corps owned. Nitrogen tank in control tower belongs to HMDC under license For Hydro electric Facility. (Annual joint inspection between the Corps and HMDC.)

	RESPONSE	REFERENCE IN TEAM
Section 4. Hazardous Waste Management		
1. Is the facility a generator of hazardous waste? Classified as Conditionally exempt small Quantity generators. Occassional minor disposal.	Yes	If YES, see checklist item HW.10.1 through HW.10.2
2. Does the facility generate less than 100 kg [220.46 lb, approx. 28 gal] of hazardous waste in 1 mo?	Yes	If YES, see checklist item HW.15.1 through HW.15.6
3. Does the facility generate more than 100 kg [220.46 lb, approx. 28 gal] but less than 1000 kg [2204.62 lb, approx. 273 gal] of hazardous waste in 1 mo?	NO	If YES, see checklist item HW.20.1 through HW.45.5
4. Does the facility generate more than 1000 kg [2204.62 lb, approx 273 gal] of hazardous waste in 1 mo?	NO	If YES, see checklist item HW.55.1 through HW.90.6

	RESPONSE	REFERENCE IN TEAM

(NOTE: Any waste which is not excepted, which is listed in 40 CFR 261, or which exhibits the following characteristics is a hazardous waste:

- Ignitability (flash point <140 F) or
- Corrosivity (pH < 2 or > 12.5) or
- TCLP Toxicity (for As, Ba, Cd, Cr, Pb, Hg, Se, Ag, and selected pesticides or
- Reactive. (or CN).)

The following are hazardous wastes that may typically be found at a facility (check if used at this facility and indicate amount used): (Per Year)

- Solvents _____
(This includes trichloroethane, Methylene, Chloride, Tetrachloroethylene, 1,1,1 Trichloroethane, Carbon tetrachloride, Chlorinated Fluorocarbons, Toluene, MEK, Mineral spirits, and Xylene.)

- Liquid paint 3-4 gals. per year
- Paint stripper, remover or thinner 1 gal per year
- Spray paint booth air filters _____
- Pesticides, insecticides, herbicides periodic licensed contract
- NRC filters and test kits _____
- Super tropical bleach _____
- Ordnance, ammunition, explosives and residues _____
- Battery acid and caustics in unserviceable batteries _____
- Pharmaceuticals _____
- POL tank farm fuel system filters _____
- De-icing solution _____
- Printing ink, ink solvents, and cleaners _____
- Absorbent material and soil contaminated with hazardous waste _____
- Other _____
- Other _____
- Other _____

5. What Hazardous Waste permits have been applied for? NONE — If any, see checklist item HW.1.3

   Part A
   Part B
   Interim Status
   None needed

6. Does the facility accept wastes from other facilities for treatment, storage, or disposal? NO — If YES, see checklist item HW.105.1 through HW.170.5

7. Does the facility operate accumulation points? NO — See checklist items based on how much is generated
   How many?_____
   Where?_____
   _____

	RESPONSE	REFERENCE IN TEAM
8. Does the facility operate satellite accumulation points? How many? _____	NO	See checklist items based on how much is generated
9. Does the facility treat hazardous waste onsite? How and where? _____	NO	If YES, see checklist item HW.105.1 through HW.255.3
10. Does the facility store (temporary or long term) hazardous waste onsite at other than an accumulation point? Where? _____	NO	If YES, see checklist item HW.105.1 through HW.255.3
11. Does the facility dispose of hazardous waste onsite? How and where? _____	NO	If YES, see checklist item HW.105.1 through HW.255.3

	RESPONSE	REFERENCE IN TEAM

Section 5. Natural Resources Management

1. Does the facility have any outdoor recreation areas? (i.e., athletic fields, walking/hiking tracks, off-road vehicles tracks, etc.) — Yes — If YES, see checklist item NR.1.3

2. Does the facility have a plan for managing its natural resources? — Yes — See Supplement

3. Are there any areas on the facility that have: — Yes — If YES, see checklist item NR.10.1 through NR.10.3

   A. Wetlands? If so, are they permitted/regulated by definition?

   B. Flood Plains?
   25-yr ——
   50-yr ——
   100-yr ——
   NO FP delinitations with in reservoir, FC impoundments to various elevation for storge.

C. Shoreline? Yes — Not permitted or regulated

D. Forests? Yes

4. Has a survey to locate and identify threatened and endangered species and critical habitats been initiated? — NO — If YES, see checklist item NR.20.1 through NR.20.3

   See budget schedule.

5. Does the facility have any endangered species on its property? — NO ? — If YES, see checklist item NR.20.1 through NR.20.3

   UNKNOWN. See budget schedule perposal For Survey.

	RESPONSE	REFERENCE IN TEAM
Section 6. Other Environmental Issues		
1. Has the facility recently (within the past 5 yr) prepared, or is it in the process of preparing, and environmental assessment (EA) or environmental impact statement (EIS)?	NO	If YES, see checklist item O1.1.1 through O1.5.14
For current mission?	EA dated 1994 is being scheduled for update, see budget schedule.	
For future Master Plan?	See Planning for 5-year schedule	
Any construction projects, timber sales, etc.?	NO	
2. Does the facility have any operations that produce environmental noise or noise that goes outside the facility (i.e.,ranges, skeet ranges, helicopter pad, generators, highway transportation)?	NO	If YES, see checklist item O2.1.1 through O2.1.3
3. Is the facility engaged in any real property transaction?	NO	If YES, see checklist item O5.1.1 through O5.1.3 and see Supplement

	RESPONSE	REFERENCE IN TEAM
Section 7. Pesticide Management		
1. Does the facility use pesticides? Contractor application? ✓ In-house application? _____ Both contractor and in-house application? _____	Yes	If YES, see checklist item PM.5.1 through PM.20.2
2. Are any pesticide wastes disposed of at the facility?	NO	If YES, see checklist item PM.55.1
3. Are pesticides stored on the facility? Please list locations. _____ _____ _____	NO	If YES, see checklist item PM.45.1 through PM.45.2
4. What are the pesticides used at the facility? (Attach a separate list if necessary) Contract service every 5+ years. Krenite approved by State Health Service Dept. See program file	✓	NA
5. Are pesticides used at offsite satellite facilities?	NO	If YES, see checklist item PM.5.1 through PM.45.2
6. Does the facility maintain a pesticide/entomology shop? If YES, is it permitted by the state?	NO	If YES, see checklist item PM.45.1 through PM.45.2
7. Is there an annual inventory available for review?	N/A	See Supplement

Any pesticide on hand would be included in the Annual hazardous Material Inventories required by the Safety office. Any periodic service Contract plans And Application record is retained IAW ER 1130-2-413

	RESPONSE	REFERENCE IN TEAM
Section 8. Petroleum, Oil, and Lubricant (POL) Management		
1. Does the facility have a current (3 yr old or less) Spill Prevention Control and Countermeasure (SPCC) plans? Completed in Sept. 1995	Yes	If YES, see checklist item PO.5.1 through PO.5.7
2. Is the SPCC/ISC exercised annually (mock spill events conducted)? Just received Plan in October 1995	N/A	If YES, see checklist item PO.5.1 through PO.5.7
3. Does the facility store used oil? Where? _____ _____ _____ _____	NO	If YES, see checklist item PO.60.1 through PO.90.1
4. Does the facility have any pipelines?	NO	If YES, see checklist item PO.40.1 through PO.40.10
5. Does the facility operate any service stations?	NO	If YES, see checklist item PO.45.1 through PO.45.4

	RESPONSE	REFERENCE IN TEAM

Section 12. Wastewater Management

1. Does the facility have a National Pollutant Discharge Elimination System (NPDES) and/or State Pollutant Discharge Elimination System (SPDES) permit? Identify the types of discharges: — NO — If YES, see checklist item WA.10.1 through WA.10.6

   Stormwater runoff permits?_____
   Drainage water from dredge and fill materials?_____
   Wastewater treatment plant? _____
   How many and what size?_____
   Process wastewater?_____
   Heat/Power production cooling blowdown water?_____
   Stormwater runoff from fuel dispensing areas, airfields, and parking lots/aprons and maintenance facilities?_____
   Vehicle wash facilities? How many?_____
   Plating shops? _____
   Does the facility maintain sedimentation holding ponds or seepage pits from vehicle/aircraft washing, maintenance shop drainage (shop operations and motor parks), and other activities?
   _____
   Operate cooling towers and pass through water? _____
   Septic Systems?_____
   Fresh water wetlands?_____
   Industrial waste system/discharge?_____
   Lines which bypass treatment structures?_____
   Other?_____

2. Does the facility discharges into a publicly owned treatment works (POTW) any of the following? — NO — If YES, see checklist item WA.10.1 through WA.25.9

   Process wastewater?_____
   Domestic (sanitary) wastewater?_____
   Industrial wastewater treatment plant effluent?_____
   Other?_____

3. Are there any discharge bypass lines in the system? — NO — If YES, see checklist item WA.25.1 through WA.25.9

4. Does the facility have any sludge disposal areas from vehicles/equipment washing operations? — NO — If YES, see checklist item WA.1.3

   Is the sludge analyzed or characterized on a scheduled frequency prior to disposal?

5. What percent of vehicle maintenance is performed by contract? — 98 % — If YES, see checklist item WA.1.3

   Is it performed onsite or offsite? offsite

	RESPONSE	REFERENCE IN TEAM
Section 13. Water Quality Management		
1. Does the facility operate a public drinking water system?	NO	If YES, see checklist item WQ.10.1 through WQ.30.3
2. Does the facility maintain wellheads?	NO	If YES, see checklist item WQ.1.3
3. Does the facility operate an underground injection well?	NO	If YES, see checklist item WQ.1.3
4. Are there groundwater aquifers on the facility?	NO	If YES, see checklist item WQ.95.1
Are they in use? _____		
5. Is the facility located on a sole source aquifer?	NO	If YES, see checklist item WQ.95.1
6. Are protective or preventative measures in place to prevent contamination of these aquifers?	N/A	If YES, see checklist item WQ.95.1
7. Are field water purification units used?	NO	See Supplement

How is the backwash managed from these mobile units?

_____

_____

_____

_____

Signature of individual completing this form: Robert B Moretz

Date completed: 02/26/96

Additional Information

ATTENTION: The following records should be available for review by the assessment team either prior to the assessment or immediately upon arrival at the facility. Not all facilities will have, or are even required to have, all of the following documents.

General

1. Detailed maps of the facility indicating street names and building numbers. Enough for one for every member of the assessment team.
2. A phone list.
3. Copies of notice of violations (NOVs) issued to the facility in any of these areas.
4. A copy of the Building Information Schedule (activity listing by building number).

Air Emissions Management

1. Air emissions inventory.
2. All air related permits.
3. A list of steam generating units and boilers and their size, fuel used, and locations.

Cultural Resources Management

1. Any cultural or archeological resources surveys.
2. Management plans for cultural and archeological resources.
3. A list of properties nominated for the National Register.

Hazardous Materials Management

1. A list of hazardous material storage/use areas.
2. A waste minimization plan
3. MSDS.
4. Documentation of personnel training.
5 The OHSCP
6. A copy of any reports of spills.
7. Copies of the Tier I or Tier II reports.
8. Documentation on contaminated sites.

Hazardous Waste Management

1. The Hazardous Waste Management Plan.
2. A list of hazardous wastes generated at the facility.
3. A list of waste generation/storage areas.
4. USEPA Identification number.
5. Manifests.
6. Any permits.
7. The biennial report.
8. Personnel training records.

Natural Resources Management

1. The endangered species survey.
2. The Natural Resources Management Plan.
3. Any land management plans.
4. Section 404 permits.

Other Environmental Issues
1. Copies of EISs, EAs, FNSIs.
2. Noise complaint log.

Pesticides Management
1. The Pesticide Management Plan.
2. A list of pesticide storage sites.
3. Application records.
4. MSDSs for pesticides.
5. Personnel Certifications for applicators.
6. Contracts for pesticide application.

POL Management
1. The SPCC plan.
2. A list of POL storage areas (not including tanks).

Solid Waste Management
1. Any contracts with waste haulers.
2. Any recycling plans.
3. All documentation pertaining to landfill operation or closure.
4. Records on groundwater sampling resulting from monitoring wells.

Storage Tank Management
1. A list of facility storage tanks (POL, hazardous waste, etc.).
2. Upgrading and/or closure plans for USTs.
3. Release detection documentation.
4. Integrity test results for ASTs and USTs.
5. Site contamination reports after tank removal.

Toxic Substances Management
1. The PCB inventory and annual report.
2. The results of the asbestos survey.
3. The Asbestos Management Plan.
4. Radon survey results.

Wastewater Management
1. All NPDES/SPDES permits.
2. Maps of the storm, sanitary, and industrial sewers.
3. A copy of pretreatment standards imposed on the facility.
4. A list of maintenance shops/operations to include wash facilities.
5. Locations of holding ponds, sedimentation pits, and open/end-of-pipe discharge points.

Water Quality Management
1. Copies of drinking water test results.
2. Copies of reports to the state.

Hartford MOC

Table 1

ERGO PREVISIT QUESTIONNAIRE (PVQ)

This questionnaire will provide background information necessary to plan and conduct an environmental compliance assessment. Additionally it provides insight for properly designing the composition of expertise on the assessment team.

Name of Facility: 4 [illegible]
Environmental POC:
Telephone Number: (860) 379-6725 Tim Anthony

RESPONSE

Section 1. Air Emissions Management

1. Does the facility have any air permits to maintain with state regulatory authority (i.e. boilers, pathological incinerators, operating or construction permits, paint spray booths, POL tank vents, etc.)? Inclusively list the types and numbers of each: — No

Type of Permit	Quantity

2. Does the facility operate a fuel burner (central steam plant or hot water steam boiler)? — No

If YES, how large and what fuel is used?

Size	Fuel

3. Does the facility operate an incinerator (i.e., for classified documents, solid waste, sewage sludge, etc.)? If YES, please list type and number. — No

Type	Number

4. Does the facility operate fuel dispensing facilities? — No

How many? _____

5. Does the facility use any volatile organic compound (VOC) based solvent degreasers? —

RESPONSE

6. Does the facility operate maintenance shops? No

Type	Quantity
Wheeled	_____
Tracked	_____
Aircraft	_____

Please list any additionally shop activities that generate any form of air pollution (i.e., vehicle emissions systems, ventilation systems for various operations, etc.)

_____
_____
_____

7. Does the facility operate equipment or processes that could lead to fugitive emissions of vinyl chlorides or benzene? No

What types of equipment? _____

8. Does the facility procure/use chlorofluorocarbons (CFC) or halon substances? No

9. Does the facility repair any units containing refrigerant? No

10. Does the facility recycle/reclaim CFCs or halon? No

11. Does the facility have any vapor emissions requirements for oil/water separators that have been imposed upon them. No

RESPONSE

Section 2. Cultural Resources Management

1. Does the facility have any cultural resources eligible for or that are currently listed in the National Register of Historic Places? No

2. Are their any cultural resources (archeological sites, buildings over 50 yr old) that have not been evaluated for the National Register? No

3. Does the facility Master Plan contain a cultural resources overlay that is utilized for planning purposes? No

4. Is there an on-staff Cultural Resources Coordinator? No

5. If not, does a staff person have cultural resources as "other duties as assigned"? No

6. Does the facility have any archeological artifacts in storage? No

7. Does the facility have in storage, or know of, any locations of Native American burials, cemeteries, or human remains? No

8. Are there any areas on the facility considered to have religious importance to any Native American Tribe? No

RESPONSE

Section 3. Hazardous Materials Management

1. Has the facility conducted training for individuals working with hazardous materials? Yes

2. Does the facility have an Oil and Hazardous Substances Contingency Plan (OHSCP)? Yes

3. Does the facility store any extremely hazardous substances? No

4. Does the facility store at one time 10,000 lb or more of any hazardous substances that requires a Material Safety Data Sheet (MSDS) (fuel is a hazardous substance which requires an MSDS)? Yes

   (NOTE: Using water as a basis of measurement, 10,000 lb is approx. 1,250 gal.)

   Please list substances

   Approx 1300 gals - Hydraulic Oil in Gate Control System-Elev 590 of Tower

5. Does the facility store any flammable/combustible liquids? Yes

   Emergency generator diesel fuel in self contained tank - 85 gals (full)

6. Does the facility store any compressed gases? Yes

   Nitrogen for gate control system Elev. 590 of Tower

RESPONSE

Section 4. Hazardous Waste Management

1. Is the facility a generator of hazardous waste? Yes
   Oil absorbent material from tower gate hydraulics. Very limited

2. Does the facility generate less than 100 kg [220.46 lb, approx. 28 gal] of hazardous waste in 1 mo? Yes

3. Does the facility generate more than 100 kg [220.46 lb, approx. 28 gal] but less than 1000 kg [2204.62 lb, approx. 273 gal] of hazardous waste in 1 mo? No

4. Does the facility generate more than 1000 kg [2204.62 lb, approx 273 gal] of hazardous waste in 1 mo? No

RESPONSE

(NOTE: Any waste which is not excepted, which is listed in 40 CFR 261, or which exhibits the following characteristics is a hazardous waste:

- Ignitability (flash point <140 F) or
- Corrosivity (pH < 2 or > 12.5) or
- TCLP Toxicity (for As, Ba, Cd, Cr, Pb, Hg, Se, Ag, and selected pesticides or
- Reactive. (or CN).)

The following are hazardous wastes that may typically be found at a facility (check if used at this facility and indicate amount used):

- Solvents _____
(This includes trichloroethane, Methylene, Chloride, Tetrachloroethylene, 1,1,1 Trichloroethane, Carbon tetrachloride, Chlorinated Fluorocarbons, Toluene, MEK, Mineral spirits, and Xylene.)

✓- Liquid paint (1-2, not stored)
- Paint stripper, remover or thinner _____
- Spray paint booth air filters _____
- Pesticides, insecticides, herbicides _____
- NRC filters and test kits _____
- Super tropical bleach _____
- Ordnance, ammunition, explosives and residues _____
✓- Battery acid and caustics in unserviceable batteries - Batteries in service
- Pharmaceuticals _____
- POL tank farm fuel system filters _____
- De-icing solution _____
- Printing ink, ink solvents, and cleaners _____
✓- Absorbent material and ~~soil~~ contaminated with hazardous waste - oil
- Other _____
- Other _____
- Other _____

5. What Hazardous Waste permits have been applied for? None

Part A
Part B
Interim Status
None needed

6. Does the facility accept wastes from other facilities for treatment, storage, or disposal? No

7. Does the facility operate accumulation points? No
How many?_____
Where?_____
_____

RESPONSE

8. Does the facility operate satellite accumulation points? No
   How many? _____

9. Does the facility treat hazardous waste onsite? No

   How and where? _____

10. Does the facility store (temporary or long term) hazardous waste onsite at other than an accumulation point? No

    Where? _____

11. Does the facility dispose of hazardous waste onsite? No

    How and where? _____

RESPONSE

Section 5. Natural Resources Management

1. Does the facility have any outdoor recreation areas? (i.e., athletic fields, walking/hiking tracks, off-road vehicles tracks, etc.) No

2. Does the facility have a plan for managing its natural resources? Yes

3. Are there any areas on the facility that have:

   A. Wetlands? If so, are they permitted/regulated by definition? No

   B. Flood Plains?
   25-yr ?
   50-yr ? No
   100-yr ?

C. Shoreline? No
D. Forests? No

4. Has a survey to locate and identify threatened and endangered species and critical habitats been initiated? No

5. Does the facility have any endangered species on its property? No

RESPONSE

Section 6. Other Environmental Issues

1. Has the facility recently (within the past 5 yr) prepared, or is it in the process of preparing, and environmental assessment (EA) or environmental impact statement (EIS)? No

   For current mission? No

   For future Master Plan? No

   Any construction projects, timber sales, etc.? No

2. Does the facility have any operations that produce environmental noise or noise that goes outside the facility (i.e.,ranges, skeet ranges, helicopter pad, generators, highway transportation)? No

3. Is the facility engaged in any real property transaction? No

RESPONSE

Section 7. Pesticide Management

1. Does the facility use pesticides? No

   Contractor application? _____
   In-house application? _____
   Both contractor and in-house application? _____

2. Are any pesticide wastes disposed of at the facility? No

3. Are pesticides stored on the facility? No

   Please list locations.

   _____
   _____
   _____

4. What are the pesticides used at the facility? None
   (Attach a separate list if necessary)

   _____
   _____
   _____
   _____

5. Are pesticides used at offsite satellite facilities? No

6. Does the facility maintain a pesticide/entomology shop? No

   If YES, is it permitted by the state?

7. Is there an annual inventory available for review? N/A

RESPONSE

Section 8. Petroleum, Oil, and Lubricant (POL) Management

1. Does the facility have a current (3 yr old or less) Spill Prevention Control and Countermeasure (SPCC) plans? Yes
   - MDC Watershed Protection Plan - Aug '95
   - Colebrook River Lake SPCC Plan

2. Is the SPCC/ISC exercised annually (mock spill events conducted)? Yes
   Annual Training, but not on site.

3. Does the facility store used oil? No

   Where?

   _____
   _____
   _____
   _____

4. Does the facility have any pipelines? No

5. Does the facility operate any service stations? No

RESPONSE

Section 9. Solid Waste Management

1. Does the facility have a solid waste management facility onsite? No

TYPE	NUMBER
Landfill	_____
Incinerator	_____
Transfer Point	_____

2. Does the facility contract out the collection of its solid waste? No

3. Does the facility have a: Yes

solid waste recycling program? List commodities recycled:
Paper, plastics

Construction debris landfill:
Is it permitted?
Operated by: _____

4. Is waste transported offsite for disposal? Yes

In landfills? No

In incinerators? No

Transfer Stations? Yes

Recycling plant? No

5. Does the facility dispose of ash residue or sludge: No
Offsite? _____
Onsite? _____

6. Does the facility receive refuse from outside the United States? No

If YES, is laboratory testing performed? _____

7. Does the facility operate battery shops, including charging areas within vehicle maintenance facilities? No

If YES, how many? _____

RESPONSE

Section 10. Storage Tank Management

1. Does the facility have aboveground storage tanks (ASTs) used for the storage of petroleum products or hazardous waste? (Attach additional page if necessary) — Yes

Location	Substance	Capacity
Tower E/590	Hyd Oil	1300 gal
Switchyard	Emer. Gen Fuel	85 gal

2. Does the facility have any USTs? — No

Location	Quantity	Size	Material Stored	Permitted

(Attach a separate inventory sheet if necessary)

3. Does the facility have any USTs out-of-service or abandoned? — No

4. Is there a program in place to manage unserviceable/abandoned tanks? — N/A

RESPONSE

Section 11. Toxic Substances Management

1. Has the facility conducted a survey for PCBs? No

2. Are PCBs or PCB-contaminated oils in use or stored at the facility in: No

   Transformers_____
   Capacitors_____
   Electromagnets_____
   Heat Transfer or Hydraulic Systems_____
   Circuit Breaker_____
   Fluorescent Light Ballasts_____
   Other_____

3. Does the facility dispose of PCBs or PCB items at the facility No

4. Does the facility transport PCBs No

5. Has the facility conducted a complete facility-wide asbestos survey? No
6. Does an Asbestos Management Plan exist? No
7. Is maintenance done on items insulated with asbestos? No

8. Has the facility undergone any asbestos removal projects in the past? No

   How long ago? _____
   By contract or in-house? _____

9. Is there any asbestos on the facility that has been removed and is awaiting disposal? No

10. Will the facility have any demolition, remodeling, or renovation projects underway at the time of the assessment? No

    Please identify those projects and buildings.

    _____
    _____

	RESPONSE
11. Is asbestos material removed by contract or in-house personnel?	N/A
12. Does the facility monitor for radon gas?	No
13. Is there a program to reduce radon threat?	No
14. Has the facility populace been informed of the final status?	N/A
15. Is the facility performing any lead based paint removal?	No

RESPONSE

Section 12. Wastewater Management

1. Does the facility have a National Pollutant Discharge Elimination System (NPDES) and/or State Pollutant Discharge Elimination System (SPDES) permit? Identify the types of discharges: No

   Stormwater runoff permits?_____
   Drainage water from dredge and fill materials?_____
   Wastewater treatment plant? _____
   How many and what size?_____
   Process wastewater?_____
   Heat/Power production cooling blowdown water?_____
   Stormwater runoff from fuel dispensing areas, airfields, and parking lots/aprons and maintenance facilities?_____
   Vehicle wash facilities? How many?_____
   Plating shops? _____
   Does the facility maintain sedimentation holding ponds or seepage pits from vehicle/aircraft washing, maintenance shop drainage (shop operations and motor parks), and other activities?
   _____
   Operate cooling towers and pass through water? _____
   Septic Systems?_____
   Fresh water wetlands?_____
   Industrial waste system/discharge?_____
   Lines which bypass treatment structures?_____
   Other?_____

2. Does the facility discharges into a publicly owned treatment works (POTW) any of the following? No

   Process wastewater?_____
   Domestic (sanitary) wastewater?_____
   Industrial wastewater treatment plant effluent?_____
   Other?_____

3. Are there any discharge bypass lines in the system? No

4. Does the facility have any sludge disposal areas from vehicles/equipment washing operations? No

   Is the sludge analyzed or characterized on a scheduled frequency prior to disposal?

5. What percent of vehicle maintenance is performed by contract? None

   Is it performed onsite or offsite?_____

RESPONSE

Section 13. Water Quality Management

1. Does the facility operate a public drinking water system? No

2. Does the facility maintain wellheads? No

3. Does the facility operate an underground injection well? No

4. Are there groundwater aquifers on the facility? No

   Are they in use? _____

5. Is the facility located on a sole source aquifer? No

6. Are protective or preventative measures in place to prevent contamination of these aquifers? N/A

7. Are field water purification units used? No

   How is the backwash managed from these mobile units?

   _____
   _____
   _____
   _____

Signature of individual completing this form: [signature] Timothy J. Anthony Hydroelectric Supervisor HMCC

Date completed: 3/12/96

Additional Information

ATTENTION: The following records should be available for review by the assessment team either prior to the assessment or immediately upon arrival at the facility. Not all facilities will have, or are even required to have, all of the following documents.

General

1. Detailed maps of the facility indicating street names and building numbers. Enough for one for every member of the assessment team.
2. A phone list.
3. Copies of notice of violations (NOVs) issued to the facility in any of these areas.
4. A copy of the Building Information Schedule (activity listing by building number).

Air Emissions Management

1. Air emissions inventory.
2. All air related permits.
3. A list of steam generating units and boilers and their size, fuel used, and locations.

Cultural Resources Management

1. Any cultural or archeological resources surveys.
2. Management plans for cultural and archeological resources.
3. A list of properties nominated for the National Register.

Hazardous Materials Management

1. A list of hazardous material storage/use areas.
2. A waste minimization plan
3. MSDS.
4. Documentation of personnel training.
5 The OHSCP
6. A copy of any reports of spills.
7. Copies of the Tier I or Tier II reports.
8. Documentation on contaminated sites.

Hazardous Waste Management

1. The Hazardous Waste Management Plan.
2. A list of hazardous wastes generated at the facility.
3. A list of waste generation/storage areas.
4. USEPA Identification number.
5. Manifests.
6. Any permits.
7. The biennial report.
8. Personnel training records.

Natural Resources Management

1. The endangered species survey.
2. The Natural Resources Management Plan.
3. Any land management plans.
4. Section 404 permits.

Other Environmental Issues
1. Copies of EISs, EAs, FNSIs.
2. Noise complaint log.

Pesticides Management
1. The Pesticide Management Plan.
2. A list of pesticide storage sites.
3. Application records.
4. MSDSs for pesticides.
5. Personnel Certifications for applicators.
6. Contracts for pesticide application.

POL Management
1. The SPCC plan.
2. A list of POL storage areas (not including tanks).

Solid Waste Management
1. Any contracts with waste haulers.
2. Any recycling plans.
3. All documentation pertaining to landfill operation or closure.
4. Records on groundwater sampling resulting from monitoring wells.

Storage Tank Management
1. A list of facility storage tanks (POL, hazardous waste, etc.).
2. Upgrading and/or closure plans for USTs.
3. Release detection documentation.
4. Integrity test results for ASTs and USTs.
5. Site contamination reports after tank removal.

Toxic Substances Management
1. The PCB inventory and annual report.
2. The results of the asbestos survey.
3. The Asbestos Management Plan.
4. Radon survey results.

Wastewater Management
1. All NPDES/SPDES permits.
2. Maps of the storm, sanitary, and industrial sewers.
3. A copy of pretreatment standards imposed on the facility.
4. A list of maintenance shops/operations to include wash facilities.
5. Locations of holding ponds, sedimentation pits, and open/end-of-pipe discharge points.

Water Quality Management
1. Copies of drinking water test results.
2. Copies of reports to the state.

Appendix B: Photographs

Photo 1: Hartford MDC Hydroelectric Power Plant Emergency Generator with 85 gallon diesel fuel tank (located immediately above and parallel to concrete pad).

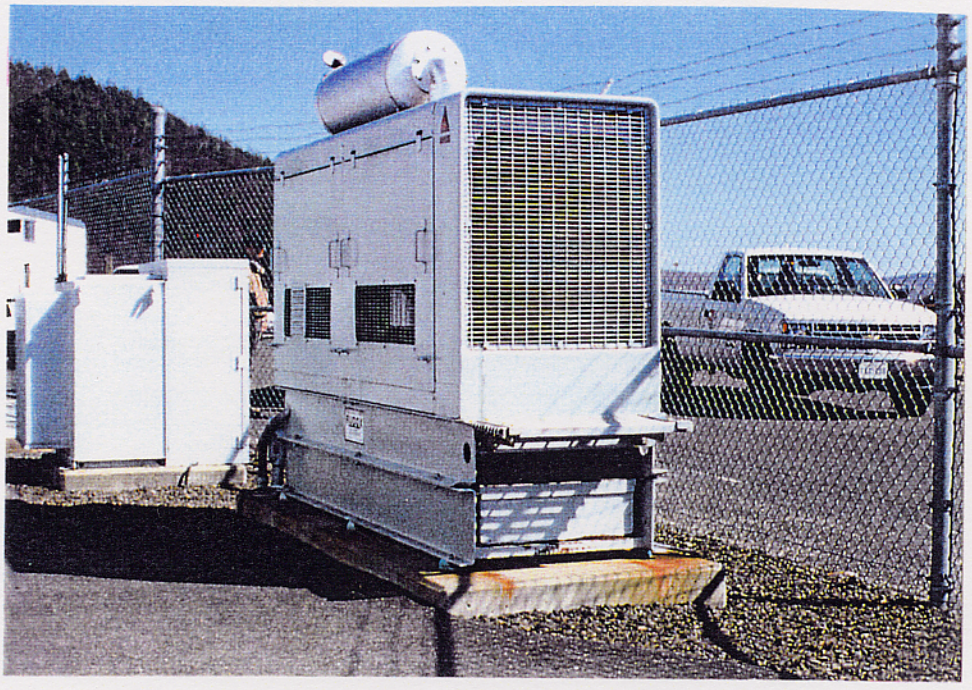

Photo 2: The Emergency Generator (in center of photo) is situated adjacent to Colebrook River Lake (in background), a secondary public drinking water supply.